## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Plaintiff

CIVIL NO. 18-10172

VS.

KEVIN A. YOUNGS

Defendant

## STIPULATION FOR CONDITIONAL DISMISSAL PURSANT TO THE TERMS OF A COMPROMISE AND SETTLEMENT AGREEMENT AND FOR ENTRY OF CONSENT JUDGMENT IN THE EVENT OF DEFAULT

WHEREAS, the Plaintiff, United States of America filed a Complaint in the above captioned matter on June 5, 2018; and

WHEREAS, the Defendant, Kevin A. Youngs, received formal service of process in this action, acknowledges receipt of a copy of the Complaint; and

WHEREAS, the parties hereto have agreed to resolve this matter; and

WHEREAS, the parties have executed a Compromise and Settlement Agreement providing that this case shell be dismissed, conditioned upon the Defendant complying with its terms; and

WHEREAS, the said Compromise and Settlement Agreement provides for the entry of a Consent Judgment in the amount of \$129,111.84, together with interest and costs of suit as of March 27, 2018, without prior notice to Defendant, upon default of the terms of the Compromise and Settlement Agreement;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned parties this action shall be dismissed conditionally pursuant to

the terms of the Compromise and Settlement Agreement, and that the Judgment shall be entered in favor of the Plaintiff, United States of America and against, Defendant, Kevin A. Youngs, in the amount of \$129,111.84, plus post-judgment interest pursuant to 28 U.S.C. § 1961, less any payments made pursuant to the terms of the Compromise and Settlement Agreement between the parties, in the event of a default by Defendant of any of the terms of the Compromise and Settlement Agreement.

Date: 6/27/19

Adam Tutfle, Esquire 1295 Teaneck Road Teaneck, NJ 07666 Attorney for Defendant

7/5/19 Date:

> Caitlin M. Donnelly, Esquire KML Law Group, P.C.

216 Haddon Avenue

Suite 406

Westmont, NJ 08108 Attorney for Plaintiff

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Defendant

## STIPULATED ORDER OF CONSENT JUDGMENT

BY THE COURT.

How. Esther Salas, U.S.D.J.